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*Attorneys for Defendants
TikTok Inc. and ByteDance Inc.*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

BERNADINE GRIFFITH,
Plaintiff,
v.
TIKTOK INC., et al.,
Defendants.

Case No. 5:23-cv-00964-SB-E
DECLARATION OF ZENO DU

1 I, Zeno Du, declare:

2 1. I work for TikTok Inc. My title is Measurement, Signal & Privacy
3 Team Lead. I have personal knowledge of the facts described below (including
4 based on conversations with others at the company), and if called as a witness, I
5 could and would testify competently thereto.

6 2. TikTok receives data via the Pixel and Events API about actions
7 website users have taken on those sites (and data about the sites themselves). It
8 then attempts to match data to an existing TikTok user, so that the advertiser can
9 more effectively deliver ads to users on the TikTok platform and measure the
10 effectiveness of those ads.

11 3. The data TikTok receives cannot be used, on its own, to identify any
12 individual. TikTok receives hashed phone numbers and email addresses. It is not
13 able to unhash the data at any point. The only other potentially identifying
14 information is IP address and cookie ID (an alphanumeric identifier that is in a
15 cookie placed on the browser). TikTok cannot use any IP address identify anyone
16 because an IP address can be used and shared by many people. Nor can cookie ID,
17 by itself, identify any person. It is a randomly assigned alphanumeric string.

18 4. Even though IP addresses cannot be used to identify individuals on
19 their own, they are considered personal information under certain privacy laws, so
20 TikTok must take precautions with respect to that data. TikTok's policy on the
21 release of personal information is restrictive because of TikTok's ongoing
22 discussions surrounding national security interests.

23 5. Sometimes information about a website "event," or action, cannot be
24 matched to a TikTok user. There are two possible reasons: either that action was
25 taken by someone who is not a TikTok user, or there is simply not enough
26 identifying information to match the action to the right TikTok user.

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